

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

EDWARD J. KOELLER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CYFLARE SECURITY INC.

Defendant.

No. 4:25-cv-00410-MTS

NOTICE OF CORRECTED DECLARATION IN RESPONSE TO JULY 23, 2025 ORDER

Plaintiff Edward J. Koeller, by and through undersigned counsel, respectfully submits this Notice of Corrected Declaration in response to the Court's July 23, 2025 Order (Doc. [27]).

On July 22, 2025, Plaintiff filed a Declaration (Doc. [26]) in connection with his Opposition to Defendant's Motion to Dismiss (Doc. [25]) ("Opposition"). The Declaration, which is identified in the Opposition as Exhibit A, was intended to be filed as an attachment thereto but was inadvertently filed as a separate, but related, docket entry.

The Declaration was signed only by Plaintiff under penalty of perjury. As the Court correctly noted, because Plaintiff is represented by counsel, Federal Rule of Civil Procedure 11(a) requires that such filings also be signed by an attorney of record.

Accordingly, Plaintiff now files a corrected version of the Declaration, identified in the Opposition as Exhibit A, and corrects the error identified in the Court's Order by including counsel's signature in compliance with Rule 11(a). The substance of the Declaration remains unchanged.

[Attorney signature block on next page]

Date: July 24, 2025

/s/ Cassandra P. Miller

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Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2025, I caused the Declaration of Edward J. Koeller in support of the Opposition to the Motion to Dismiss to be filed electronically with the Clerk of the Court using the CM/ECF system. This document was filed through the ECF system and will be served electronically on all registered participants as identified on the Notice of Electronic Filing.

Dated: July 24, 2025

Respectfully submitted,

By: /s/ Cassandra P. Miller
Cassandra P. Miller (*pro hac vice*)
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